

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

BOGDAN ROMANETS

Case No. 18-1218-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 14, 2015 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

18 U.S.C. Sections 1028(a)(1), (b)
 (1)(A)(ii) and 2

Offense Description

On or about September 14, 2015, in the Eastern District of Pennsylvania, defendant Bogdan Romanets, knowingly and without lawful authority produced, and aided and abetted and willfully caused the production of a false identification document, that is, a Pennsylvania driver's license in the name of S.S., in violation of Title 18, United States Code, Sections 1028(a)(1), (b)(1)(A)(ii) and 2.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Complainant's signature

Joshua Mitnick, Special Agent, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: July 27, 2018

*Judge's signature*City and state: Philadelphia, Pa

HON. RICHARD A. LLORET, U.S. Magistrate Judge

Printed name and title

A F F I D A V I T

I, Joshua Mitnick, being duly sworn, hereby affirm the following facts as being true to the best of my knowledge, information, and belief:

1. I have been a Special Agent with the United States Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations since February 2008. Prior to my employment as an agent with HSI, I was a canine enforcement officer with the Department of the Treasury, United States Customs Service for approximately five years. My primary investigative assignment has been the investigation of immigration and customs related matters. I have been involved in numerous immigration and customs cases either as a participating investigator or as a case agent. I have received Customs Inspector Training, Canine Enforcement Training, Criminal Investigator Training, and ICE Special Agent Training.

2. This Affidavit is made in support of a criminal complaint charging Bogdan Romanets ("Romanets") with violating 18 U.S.C §§ 1028(a)(1), (b)(1)(A)(ii) and 2 (producing a false identification document and aiding and abetting).

3. This Affidavit is based on my personal knowledge, experience and training, and other information developed during the course of this investigation. This Affidavit is also based on information and experience imparted to me by other law enforcement officers. Because this Affidavit is being submitted for the limited purpose of establishing probable cause and securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that Romanets violated 18 U.S.C. §§ 1028(a)(1), (b)(1)(A)(ii) and 2.

FACTS ESTABLISHING PROBABLE CAUSE

4. On October 4, 2014, Romanets applied for admission to the United States at Philadelphia International Airport. He provided Hungarian Passport BE2221864 bearing his photograph and the name S.S., date of birth July 24, 1974. Romanets was admitted to the United States for a period of 90 days as a visitor for tourism under the Visa Waiver Program.

5. On February 9, 2015, Romanets married Olena Ulybina, a Ukrainian born naturalized United States citizen. On May 18, 2015, United States Citizenship and Immigration Services ("USCIS") received an I-130, petition for alien relative, and an I-485, application to register permanent residence or adjust status, filed by Olena Ulybina on Romanets' behalf. The I-130 and I-485 were filed in S.S.'s name, date of birth July 24, 1974, and were approved on July 29, 2015. Upon approval of the I-130 and I-485, Romanets', using the name S.S., immigration status was adjusted to Conditional Lawful Permanent Resident.

6. On September 14, 2015, Romanets, based on his Conditional Lawful Permanent Resident status, applied for and received Pennsylvania driver's license number 32 163 513 in S.S.'s name, date of birth July 24, 1974. Romanets provided Hungarian passport BE2221864, lawful permanent resident card bearing alien number 207 668 427 and a United States Social Security card bearing the number xxx-xx-1357 as proof of his identity as S.S. when applying for the Pennsylvania driver's license. The photographs on S.S.'s Hungarian passport and lawful permanent resident card are photographs of the Romanets.

7. On May 24, 2017, a red notice was issued by Interpol at the request of Hungary. The red notice was issued in the name Bogdan Romance, date of birth February 22, 1976. The red notice stated that Bogdan Romance is a Ukrainian citizen who assumed the identity of a Hungarian citizen

named S.S.and fraudulently obtained Hungarian passport BE2221864. The picture of Bogdan Romance attached to the red notice is a picture of Romanets.

8. On June 8, 2018, Pennsylvania State Police encountered the Romanets during a traffic stop in Blooming Grove, Pennsylvania. The Pennsylvania State Police saw there was a red notice for Romanets in the name Romance and contacted the Immigration and Customs Enforcement ("ICE") office in Pike County, Pennsylvania for assistance. ICE enforcement officers arrested Romanets for immigration violations. Romanets is currently in ICE custody.

9. I provided current photographs of Romanets to Department of State, Diplomatic Security Service Investigative Analyst Leach to conduct a facial recognition search through the Department of State's databases. The photograph I provided matched Romanets' photograph in the Department of State's database. Romanets had used the photograph in the Department of State database to apply for diversity visas twice in 2004. In his diversity visa applications Romanets stated that his date of birth is February 22, 1976, and that he was born in Rostoka, Zakarpatska Province, Ukraine

10. On July 12, 2018, I interviewed Natalja Geft. During the interview, Geft confirmed that she has a son named Dennis Romanets who was fathered by Romanets. Geft is currently married to the Romanets' brother, Petro Romanets. Geft confirmed that the photograph on S.S.'s Pennsylvania driver's license number 32 163 513, and the photographs on Romanets' 2004 diversity visa applications all depict Romanets.

11. On July 12, 2018, Homeland Security Investigations Special Agent Nigro interviewed Romanets at the Pike County Correctional Institute. Romanets was read his Miranda warnings and agreed to speak to the agent. Romanets admitted that his true name is Bogdan Romanets. Romanets

stated that he paid a man 5000 Euros to help him obtain a Hungarian passport in the identity of S.S.. Romanets further stated he fathered a child with Natalja Geft named Dennis Romanets. Finally, Ramanets stated he has a brother named Petro Romanets who is married to Natalja Geft.

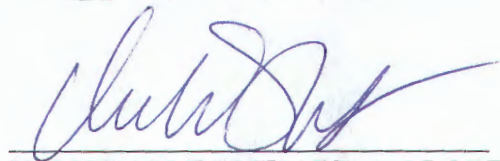
12. According to Pennsylvania Department of Transportation, the card stock used to produce Pennsylvania driver's licenses in 2015 was made in Boston, Massachusetts and shipped to Pennsylvania for production of the licenses.

13. Based upon the above, I believe there is probable cause that Bogdan Romanets knowingly and without lawful authority willfully caused the production of a false identification document, that is a Pennsylvania driver's license in S.S.'s name, in violation of 18 U.S.C. §§ 1028(a)(1), (b)(1)(A)(ii) and 2.



Special Agent Joshua A. Mitnick
Homeland Security Investigations

Sworn and subscribed before me
this 27th day of July, 2018:



HONORABLE RICHARD A. LLORET
United States Magistrate Judge